

# Exhibit B

to Hawkins Declaration

In Support of Motion for Sanctions  
Against TSI Concerning Employee A

Seaman et al. v. Nat'l Collegiate Student Loan Trust 2007-2 et al., No. 18-CV-1781

Bifulco et al. v. Nat'l Collegiate Student Loan Trust 2004-2 et al., No. 18-CV-7692

01/04/2021

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UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

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MICHELO, et al/BIFULCO, ) CIVIL ACTION NO.  
et al, ) 18 Civ. 1781;  
 ) 18 Civ. 7692  
Plaintiffs, )  
 )  
 ) VIRTUAL DEPOSITION OF  
 ) VALERIE E. WATTS, ESQ.  
 )  
-vs- )  
 )  
 )  
 )  
 )  
NAT'L COLLEGIATE )  
STUDENT LOAN TRUST )  
2007-2, et al./ NAT'L )  
COLLEGIATE STUDENT LOAN )  
TRUST 2004-2, et al., )  
Defendants.

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1 MR. HAWKINS: I am now  
2 introducing into the chat, and -- as Exhibit  
3 No. 6, I believe that we're on, is a document  
4 marked Plaintiff's 196.

5 (Deposition Exhibit No. 6 was  
6 marked for identification.)

7 BY MR. HAWKINS:

8 Q. What does this document appear to  
9 be, Ms. Watts?

10 A. It looks like a stipulation of  
11 discontinuance.

12 Q. Is it with prejudice?

13 A. Yes.

14 Q. And this is in the 761/14 action in  
15 Bronx?

16 A. Yes.

17 Q. And so it's the same State Court  
18 action that we have been looking at documents  
19 from before; correct?

20 A. Yes, I believe it is.

21 Q. Okay. Do you see your name and  
22 signature at the bottom right of that document?

23 A. Yes.

24 Q. I'm sorry, I don't know if you  
25 answered my question or not.

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1 A. I said yes.

2 Q. Okay. And do you see the date on  
3 this is August 13, 2018?

4 A. Yes.

5 Q. Okay. What conversations did you  
6 have with anyone at the Trusts before, if any  
7 conversations, before signing this stipulation?

8 A. None.

9 Q. Okay. What conversations, if any,  
10 did you have with an employee of Transworld NCO  
11 before signing this stipulation?

12 A. None.

13 Q. What conversations with other  
14 employees at Forster did you have before  
15 signing this stipulation?

16 MR. NOVIKOFF: Objection to  
17 the form.

18 THE WITNESS: I don't recall  
19 any conversations with any employees of Forster  
20 & Garbus before signing this stipulation.

21 BY MR. HAWKINS:

22 Q. Did you alone have authority to sign  
23 this stipulation?

24 MR. NOVIKOFF: Objection.

25 THE WITNESS: In what regard,

1 from whom?

2 BY MR. HAWKINS:

3 Q. Well, you just -- okay. Did you  
4 have authority from the client to sign this  
5 stipulation without confirming with the client  
6 beforehand?

7 MR. NOVIKOFF: Objection.

8 MR. SCHULTZ: Object to form.

9 THE WITNESS: Okay. So I will  
10 answer the question. First of all, this is a  
11 case in Civil Court Bronx, No. 1. Okay.

12 No. 2, what happens with the case is  
13 totally dependent on who the judge is.

14 I am guessing by this that this was  
15 marked for trial and we were not able to go  
16 forward. So the judge directed, since my  
17 witness didn't appear with me on that date,  
18 that it should be discontinued. That would be  
19 my guess. I can confirm this by looking at  
20 e-Courts, but I don't have access to e-Courts  
21 right now.

22 BY MR. HAWKINS:

23 Q. Okay. Would it help you if I called  
24 up e-Courts?

25 A. You don't call up e-Courts. It's